



Public Utility and Telecommunications Consulting

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Re: CG Docket No. 10-51 and CG Docket No. 03-123

Ex Parte Comment on Further Notice of Proposed Rulemaking

Rolka Loube (RL) is the Administrator of the Interstate TRS Fund and the Administrator of the VRS User Registration Database (VRS URD).

Regarding paragraph 122 of FNPR FC 17-26, RL requests that the FCC consider this late filed comment recommending the deletion of the requirement that VRS providers submit the Tax Identification Number (TIN) within enterprise phone registration data. Many small organizations utilize their full Social Security Numbers (SSN) as their TIN. RL does not have specific intentions to utilize the TINs for validation processing purposes applicable to enterprise phone registrations. The requirement would mean potentially sensitive TINs (full SSNs) would be accepted, processed and stored in the User Registration Database (URD) in contrast with the last four digits of VRS user data which is not retained once the user identity has been verified and it would also be on all of the provider systems that register enterprise phones. This would potentially create high risk with little validation return value in requiring this data element. The implementation of enterprise video phone user logins, proposed within paragraphs 119 and 120 the FNPR, will ensure per call identity validation for shared use public and private enterprise phones. In conclusion, RL is asking the FCC remove the TIN data element field requirement for enterprise videophone registrations in the URD.

Sincerely,

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David Rolka, President

cc: via email:

Karen Peltz Strauss, Deputy Chief, CGB  
Eliot J. Greenwald, Deputy Chief, DRO  
Andrew Mulitz, TRS Fund COTR